REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 8, 12 and 13 are amended, claim 20 is added and Figure 3 is corrected.

Applicant appreciates the Examiner indicating that claims 8-10 include allowable subject matter.

I.   The Drawings Satisfy Formal Requirements

The drawings are objected to for failing to include reference signs. Accordingly, Figure 3 is corrected. Withdrawal of the objection to the drawings is respectfully requested.

II.   Claims 13 and 17 Satisfy the Requirements of 35 U.S.C. §112, Second Paragraph

Claims 13 and 17 are rejected under 35 U.S.C. §112, second paragraph as indefinite. Accordingly, claim 13 is amended.
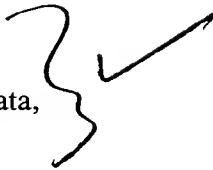
With respect to claim 17, the language generated by dividing a screen refers to the process performed by the system shown in Figure 10 and described in paragraphs [0086] to [0093]. That is, an image displayed on a Screen is captured, supplied to a personal computer 600, then divided into 6 blocks x 8 blocks (regions) in the computer 600.

Accordingly, withdrawal of the rejection of claims 13 and 17 under 35 U.S.C. §112, second paragraph is respectfully requested.

III.   The Claims Define Patentable Subject Matter

Claims 1-6, 11-12 and 18-19 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,392,630 B1 to Lin et al. in view of JP 11-113019 to Konuma et al. and further in view of U.S. Patent No. 5,191,455 to Hashimoto et al.; claim 7 is rejected under 35 U.S.C. §103(a) as unpatentable over Lin, Konuma, Hashimoto, and further in view of U.S. Patent No. 6,115,084 to Miyashita et al.; and claims 14-16 are rejected under 35 U.S.C.

§103(a) as unpatentable over Lin in view of Konuma and further in view of U.S. Patent No. 4,663,662 to Sekizawa et al. These rejections are respectfully traversed.

None of the applied art teaches, discloses or even suggests storing reference compensation data corresponding to specific levels among levels available to the image data, as claimed in claim 1 and similarly claimed in claim 2.

Instead, Lin discloses that the memory cell 11 can be a Read Only Memory for storing the compensation signals for each pixel. The compensation signals consist of M digital data sets each having N digital data. Each of the M digital data sets corresponds to a pixel array of the LCD. Each of the N digital data of the associated digital data that corresponds to pixel of the corresponding pixel array. As such, Lin teaches storing the compensation signal for each pixel but does not disclose storing reference compensation data corresponding to specific levels among levels available to the image data.

Further, the applied art does not teach, disclose or suggest interpolating the stored reference compensation in the level directions, as claimed in claim 1 and claim 2.

Instead, Konuma merely teaches interpolating for position. That is, the center coordinate data stored in the coordinate data storing section 3, it considers as the coordinate data Gc (Xc, Yc) of the central point to which the Amendment shown in Figure 3 is applied. Amendment range coordinate data is set to the coordinate data of the four vertices when the amendment field H for which the amendment shown in Figure 3 is needed, is specified in a rectangle.

Further, Applicant respectfully submits that there is no motivation to combine the references as asserted by the Examiner. For example, the Examiner admits that Lin does not disclose the steps of interpolating the stored reference compensation data, selectively reading pieces of data which correspond to pairs of reference coordinates and interpolating the read first compensation data in the coordinate direction to generate second compensation data

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which corresponds to the image data. However, the Examiner asserts that it would have been obvious to combine the two other references to make up for the admitted deficiencies of Lin.

However, Applicant submits that there is no motivation for one of ordinary skill in the art to modify Lin to perform the interpolating, selectively reading and interpolating the first compensation data in the coordinate direction to generate second compensation data, as one of ordinary skill in the art would not have had the ability to perform those steps to obtain the same results as disclosed in Lin. Each of the above references are sufficient to accomplish their own stated purposes. However, there is no advantage, and the Office Action has not asserted one, that would be obtained by modifying Lin's compensation circuit to use the interpolating processing section of Konuma. That is, Lin's compensation circuit, d/a converter and data signal line driving circuit operate independent of an interpolating process.

In fact, the Office has engaged in classic hindsight reconstruction of the references by asserting that it would have been obvious to modify the applied art. Since, as discussed above, there is no enabling disclosure in the cited references for how one of ordinary skill in the art would combine the teachings of the applied art, the Office has clearly used the teachings of the present application to support the assertion of obviousness. Nor is there any clear showing that the resulting combination would correspond to the subject matter of the claimed invention.

Additionally, "the mere fact that the worker in the art could rearrange the parts of the reference device to meet the terms of the claims on appeal is not by itself sufficient to support a finding of obviousness. The prior art must provide a motivation or reason for the worker in the art, without the benefit of Appellant specification, to make the necessary changes in the reference device." *Ex Parte Chicago Rawhide Mfg. Co.*, 223 USPQ 351, 353 (Bd.Pat.App. & Intr. 1984). Accordingly, the Office Action has failed to identify sufficient motivation for one

of ordinary skill in the art to modify Lin by Konuma and Hashimoto in the manner asserted in the Office Action.

Accordingly, withdrawal of the rejection of the claims under 35 U.S.C. §103(a) is respectfully requested.

IV.   Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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JAO:KMM/jfb

Attachments:
    Replacement Sheet
    Information Disclosure Statement

Date: January 28, 2004

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DEPOSIT ACCOUNT USE AUTHORIZATION
Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461

FIG. 3